

AAS:DKK/ICR/FJN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

BRENDAN HUNT,
also known as “X-Ray Ultra,”

Defendant.

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF APPLICATION FOR
ARREST WARRANT

(T. 18, U.S.C., § 115(a)(1)(B))

Docket No. 21-MJ- 57 M

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EASTERN DISTRICT OF NEW YORK, SS:

ERICA DOBIN, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about and between December 6, 2020, and January 12, 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant BRENDAN HUNT, also known as “X-Ray Ultra,” did knowingly and intentionally threaten to murder a United States official, with intent to impede, intimidate, and interfere with such official while engaged in the performance of official duties, and with intent to retaliate against such official on account of the performance of official duties.

(Title 18, United States Code, Section 115(a)(1)(B))

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I have served as a Special Agent with the Federal Bureau of Investigation ("FBI") since 2019. I am currently assigned to the FBI's New York Joint Terrorism Task Force, where I am responsible for conducting investigations involving domestic terrorism and threats to government officials, among other matters. Prior to my time with the FBI, I spent over six years working at the New York City Police Department's Intelligence Bureau, where I worked on counterterrorism investigations. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. The defendant BRENDANT HUNT is a resident of Ridgewood, Queens. HUNT is a part-time actor and filmmaker, and a full-time employee of the New York State Office of Court Administration. On the Internet, HUNT uses the alias "X-Ray Ultra," which he uses to post content to various social media accounts. The website for "X-Ray Ultra Studios" includes a photograph of HUNT and includes links to, among others, Facebook and Bitchute accounts under the names "xrayultra."

3. As detailed in this Affidavit, between on or about December 6, 2020, and January 12, 2021, HUNT made a series of posts on various social media websites in which he threatened, or incited others, to murder members of Congress who were engaged in the

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

performance of their official duties and in retaliation for such officials' performance of their official duties.

4. On or about December 6, 2020, HUNT posted the following message using his "HuntBrendan" Facebook account, which according to information provided by Facebook, is the administrator account for HUNT's "xrayultra" Facebook account:

Trump, we want actual revenge on democrats. Meaning, we want you to hold a public execution of pelosi aoc schumer etc. And if you dont do it, the citizenry will. We're not voting in another rigged election. Start up the firing squads, mow down these commies, and lets take america back!

I believe that the reference to "pelosi" is a reference to the Honorable Nancy Pelosi, Speaker of the House of Representatives; the reference to "aoc" is a reference to Representative Alexandria Ocasio-Cortez, who represents New York's 14th Congressional District in the House of Representatives; and the reference to "schumer" is a reference to Senate Minority Leader and New York Senator Charles E. Schumer.

5. On or about December 6, 2020, HUNT posted the following message using his "HuntBrendan" Facebook account, in response to a New York Daily News article about a Staten Island resident who allegedly used his vehicle to run over a law enforcement officer who had come to arrest the resident for violating New York City regulations to control the COVID-19 pandemic:

Fuck the lockdown po-lice! Yeah booiiii run those pigs over! Anyone enforcing this lockdown mask vaccine bullshit deserves nothing less than a bullet in their fucking head! Including cops! If you're going to shoot someone tho, go after a high value target like pelosi schumer or AOC. They really need to be put down. These commies will see death before they see us surrender! USA!!

I believe that the phrase “pelosi schumer or AOC” is another reference to Speaker Nancy Pelosi, Senator Charles E. Schumer, and Representative Alexandria Ocasio-Cortez.

6. Based on my review of public news reports, I know that on January 6, 2021, a group of individuals purporting to protest the 2020 Presidential Election gathered in Washington, D.C., and stormed the U.S. Capitol. The group breached the Capitol, assaulting law enforcement officers and damaging federal property. The group occupied the Capitol and disrupted the certification of election results by the United States Congress for a period of several hours. Members of Congress sheltered in place during the occupation. Multiple individuals have been arrested in connection with these events for offenses including illegal weapons possession. I understand that the January 6, 2021, purported protest event was promoted in advance online, that the group included many individuals who traveled interstate to Washington, D.C. for this event, and that members of the group coordinated their activities using various social media platforms, including Parler.

7. On or about January 8, 2021—two days after the riot at the Capitol—the “xrayultra” account on the video-sharing Internet site Bitchute posted an 88-second video titled “KILL YOUR SENATORS” that included the summary “Slaughter them all.” The video depicts HUNT speaking directly to the camera. During the video, HUNT says, in relevant part:

We need to go back to the U.S. Capitol when all of the Senators and a lot of the Representatives are back there, and this time we have to show up with our guns. And we need to slaughter these motherfuckers . . . [O]ur government at this point is basically a handful of traitors . . . so what you need to do is take up arms, get to D.C., probably the inauguration . . . so called inauguration of this motherfucking communist Joe Biden . . . [T]hat’s probably the best time to do this, get your guns, show up to D.C., and literally just spray these motherfuckers . . . like, that’s the only

option . . . [T]hey're gonna come after us, they're gonna kill us, so we have to kill them first . . . [S]o get your guns, show up to D.C., put some bullets in their fucking heads. If anybody has a gun, give me it, I'll go there myself and shoot them and kill them . . . [W]e have to take out these Senators and then replace them with actual patriots . . . [T]his is a ZOG government . . . [T]hat's basically all I have to say, but take up arms against them.²

8. I have compared other photographic depictions known to be of HUNT, including photographs taken by New York State agencies of HUNT, and recent photographs taken by law enforcement personnel conducting physical surveillance of HUNT, to the image of the person depicted in the Bitchute video, and the person in the video appears to be HUNT. HUNT's assertion that "[w]e need to go back to the U.S. Capitol" appears to refer to the January 6, 2021 assault on the U.S. Capitol. Similarly, his reference to the "so called inauguration of this motherfucking communist Joe Biden," appears to refer to the January 20, 2021, inauguration of President-elect Joseph R. Biden Jr. as President of the United States.

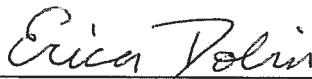
9. According to records obtained in this investigation, a phone registered to HUNT was located at or near his residence in Queens, New York, on January 8, 2021, when the "KILL YOUR SENATORS" video was uploaded to Bitchute.

10. On or about January 12, 2021, an account on the social media website Parler named "@GenFlynn" posted a message that read, in part, "America fought a good fight. Our great Country is resilient & we will get thru this difficult time. Acting responsibly at this moment is what all Americans must do. During the past 4 tough years, I found faith, family and true friends" I believe that "@GenFlynn" refers to former National Security Advisor Michael Flynn, who called on supporters of President Trump to protest on January 6, 2021.


² I understand that "ZOG" is a white-supremacist acronym for the phrase "Zionist occupied government."

In response to that message, a second account posted "I am tired of this ambiguous bullshit. Our feet are in the fire. If there is a plan tell us it. If not get the hell out of our way. The Republic will not survive lukewarm platitudes and half hearted action." A Parler account under the name "@Xrayultra" with the display name "Brendan Hunt" responded: "exactly, enough with the 'trust the plan' bullshit. lets go, jan 20, bring your guns #millionmilitiamarch[.]" Records obtained from Parler reflect that the "@Xrayultra" Parler account was registered to "Brendan Hunt" using the same email address that had been used to register "HuntBrendan" Facebook account discussed above. I believe that "jan 20" refers to January 20, 2021, the date of the inauguration of President-elect Joseph R. Biden Jr. as President of the United States.

WHEREFORE, your deponent respectfully requests that an arrest warrant issue so that the defendant BRENDAN HUNT, also known as "X-Ray Ultra," may be dealt with according to law.


ERICA DOBIN
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of this
Affidavit by reliable telephonic and electronic means
pursuant to Federal Rule of Criminal Procedure 4.1, this
18th day of January, 2021


THE HONORABLE CHERYL L. POLLAK
CHIEF UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

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